

July 17, 2013
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IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)	CASE NO. IPC-E-13-16
COMPANY'S APPLICATION FOR A)	
CERTIFICATE OF PUBLIC CONVENIENCE)	PETITION TO INTERVENE OF
AND NECESSITY FOR THE)	
INVESTMENT IN SELECTIVE)	THE SNAKE RIVER ALLIANCE
CATALYTIC REDUCTION CONTROLS)	
ON JIM BRIDGER UNITS 3 AND 4)	

The Snake River Alliance, pursuant to the Idaho Public Utilities Commission's Rules of Procedure Rule 72 and 73 IDAPA 31.01.01.072 and -.073, petitions the Commission to grant its request for intervention in the above-referenced case, IPC-E-13-16. The name and address of this intervenor is:

Snake River Alliance
Box 1731
Boise, ID 83701
208 344-9161 (o)
208 841-6982 (c)

The Snake River Alliance is represented in this proceeding by Ken Miller. Correspondence in this docket can be sent to the above address or via e-mail to: kmiller@snakeriveralliance.org. To reduce costs and environmental impacts of exchanging information in this case, the Alliance requests that, pursuant to IPUC Rules, information other than that which might be deemed confidential or otherwise must be hand-delivered be provided electronically and/or via email to the above address.

The Snake River Alliance is an Idaho-based non-profit organization, established in 1979 to address Idahoans' concerns about nuclear waste and safety issues. In 2007, the Alliance expanded the scope of its mission by becoming Idaho's first nonprofit clean energy advocacy

organization. The Alliance's energy program includes advocacy for renewable energy resources in Idaho; expanded conservation and demand-side management programs offered by Idaho's regulated electric utilities and the Bonneville Power Administration; and development of local, state, regional, and national initiatives to advance sustainable energy policies, including electric utility rate structures and designs that promote energy conservation. The Alliance pursues these programs on behalf of its members, many of whom are customers of Idaho Power.

The Alliance and those it represents have a direct interest in this case for several reasons. As the Commission is aware, the Alliance has expressed myriad concerns regarding the intent of Idaho Power and its largest coal plant partner, PacifiCorp, to undertake significant investments in their jointly owned assets at the Jim Bridger coal plant in Wyoming. Idaho Power's 2013 IRP [IPC-E-13-15] is based in part on the continued operation of this rate-based asset through the duration of this IRP planning horizon. For that to happen, as the Company points out in its application and accompanying testimonies of Lisa Grow, Michael Youngblood, and Tom Harvey, Idaho Power would need to make significant capital investments in Bridger Units 3 and 4 in order for those units to comply with existing state and federal environmental regulations and statutes.

The Alliance has a long history of advocacy on utility coal plant issues. Its staff members met with the Commission in 2012 specifically to discuss this and related issues. It has advocated before the Commission and directly with Idaho Power to encourage the Company to ensure that it consider all options when evaluating the future of its coal assets. Following the Company's filing with this Commission its 2011 IRP Update on Feb. 14, 2014, in IPC-E-11-11, the Alliance on March 11 filed a detailed response [SRA ADDITIONAL COMMENTS]. These two filings remain in IPC-E-11-11, contained in the Commission's "Closed Cases" files.

As have stakeholders in other jurisdictions where Idaho Power and PacifiCorp have filed 2013 IRPs or related dockets that contained confidential material relating to each utility's coal plant analysis, the Alliance was concerned upon the filing of the 2011 IRP Update that it would be difficult if not impossible to fully evaluate the Company's conclusions without also being able to assess the excised material. Rather than burden the Commission and Idaho Power by pursuing the confidential material in IPC-E-11-11, and confident that this CPCN application would be

filed in proximity to the filing of the 2013 IRP, and wanting avoid duplication, the Alliance opted instead to await the filing of IPC-E-13-16, which contains the same confidential material as well as other information not disclosed in the Application or accompanying testimonies and exhibits.

The Alliance seeks status as a party to this case to enable it to review the merits of Idaho Power's CPCN request for Bridger Units 3 and 4. While Commission rules prohibit the Alliance from participating in certain areas of the case requiring the benefit of counsel, the Alliance's experience with the issues at hand position it well to otherwise participate as a party. Furthermore, the Alliance and its members are directly involved in the issues that will be addressed in this case and, of course, in its outcome. We believe our participation in this case will assist the Commission and intervening parties in the administration of this docket inasmuch as the Alliance helps bring the voice of clean energy advocates to this case. We believe our participation will not burden the Commission, the Company and other parties.

We believe this case will present the Commission with many of the issues that will be addressed in PacifiCorp's 2013 IRP [PAC-E-13-05] for which the Alliance has been granted permission to intervene and in which it has provided executed protective agreements to Rocky Mountain Power in order to be able to review similarly confidential materials relating to Bridger Units 3 and 4, among other issues. For that matter, Idaho Power's 2013 IRP [IPC-E-13-15] is equally intertwined with this Application as is PacifiCorp's 2013 IRP. Each of the three cases involves Bridger Units 3 and 4 to some degree, and the outcome of this case might have profound impacts on resource planning by both utilities.

The Alliance believes it and those it represents have direct interests in this case, that its participation as in intervenor will not complicate or extend this case, and that to the extent allowed by Commission rules it will participate in this case.

The Alliance therefore requests that the Commission grant its request to participate in this case as an intervening party and that it be allowed to participate in this case on behalf of its constituents.

Therefore and pursuant to Rules 72 and 73 of the Commission's Rules of Procedure, IDAPA 31.01.01.072 and 073, the Alliance requests that this petition to participate in Case No. PAC-E-13-05 be granted.

Respectfully submitted,

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